

Message

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**From:** Emilsson, Gunnar [EmilssonGR@cdmsmith.com]  
**Sent:** 6/7/2018 1:33:10 AM  
**To:** Cirian, Mike [Cirian.Mike@epa.gov]  
**Subject:** RE: CFAC Background SAP - Responses to EPA Comments

Thanks! I know you are swamped and hated to bug you, but sometimes messages from above don't trickle down to the troops.

Have a nice weekend. I have all day out of town meetings tomorrow, then off Friday going to go cat fishing at

## Deliberative Process / Ex. 5

thinking that may slip into early next week.

Sent from my Verizon 4G LTE smartphone

----- Original message -----

**From:** "Cirian, Mike" <Cirian.Mike@epa.gov>  
**Date:** 6/6/18 5:51 PM (GMT-07:00)  
**To:** "Emilsson, Gunnar" <EmilssonGR@cdmsmith.com>  
**Subject:** RE: CFAC Background SAP - Responses to EPA Comments

## Deliberative Process / Ex. 5

MIKE

Mike Cirian, PE  
Libby On-site Project Manager  
US EPA  
108 East 9th Street  
Libby, MT 59923  
(406) 293-6194 Office

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**From:** Emilsson, Gunnar [mailto:EmilssonGR@cdmsmith.com]  
**Sent:** Wednesday, June 6, 2018 3:03 PM  
**To:** Cirian, Mike <Cirian.Mike@epa.gov>  
**Subject:** FW: CFAC Background SAP - Responses to EPA Comments  
**Importance:** High

Hi Mike:

## Deliberative Process / Ex. 5

Thanks,  
Gunnar

**From:** Sloan, Richard <RSloan@mt.gov>  
**Sent:** Wednesday, June 06, 2018 7:45 AM  
**To:** Emilsson, Gunnar <EmilssonGR@cdmsmith.com>; Cirian.Mike@epa.gov  
**Cc:** Berry, David <Berry.David@epa.gov>; Sanchez, Brian <sanchez.brian@epa.gov>; Woodbury, Lynn <woodburyl@cdmsmith.com>; Coan, Sean <CoanSM@cdmsmith.com>; Balliew, Carolina <Carolina.Balliew@mt.gov>  
**Subject:** RE: CFAC Background SAP - Responses to EPA Comments

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I thank you.  
Dick Sloan

**From:** Emilsson, Gunnar [mailto:EmilssonGR@cdmsmith.com]  
**Sent:** Tuesday, June 05, 2018 1:58 PM  
**To:** Cirian.Mike@epa.gov  
**Cc:** Berry, David <Berry.David@epa.gov>; Sanchez, Brian <sanchez.brian@epa.gov>; Sloan, Richard <RSloan@mt.gov>; Woodbury, Lynn <woodburyl@cdmsmith.com>; Coan, Sean <CoanSM@cdmsmith.com>  
**Subject:** FW: CFAC Background SAP - Responses to EPA Comments

# Deliberative Process / Ex. 5

~~Gunnar Emilsson, Project Manager, CDM Smith~~  
Project Manager  
CDM Smith  
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emilssongr@cdmsmith.com  
<http://cdmsmith.com>

**From:** Coan, Sean  
**Sent:** Tuesday, June 05, 2018 1:53 PM  
**To:** Woodbury, Lynn <woodburyl@cdmsmith.com>; Emilsson, Gunnar <EmilssonGR@cdmsmith.com>  
**Subject:** RE: CFAC Background SAP - Responses to EPA Comments

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-Sean

**From:** Woodbury, Lynn  
**Sent:** Tuesday, June 05, 2018 12:52 PM  
**To:** Emilsson, Gunnar <EmilssonGR@cdmsmith.com>  
**Cc:** Coan, Sean <CoanSM@cdmsmith.com>  
**Subject:** RE: CFAC Background SAP - Responses to EPA Comments

My two cents...

- 1) The response adequately addresses the comment.
- 2) The response provides the requisite detail to support the selection of an N of 10 samples based on a Form I Background Test. This information should be added to the SAP (the comment does not indicate they intend to add this to the SAP). However, there is no discussion of whether an N of 10 samples will be adequate to support a Form 2 Background Test, which is something I also recommended during the call. That being said, Roux could continue with the collection of 10 samples per area provided that they understand they do so at their own peril. It is possible subsequent power calculations may determine the sample size is not adequate to support decision-making (and EPA may require additional background data collection in the future to address this data limitation).
- 3) The response adequately addresses the comment.
- 4) The response adequately addresses the comment.
- 5) The response adequately addresses the comment.

My recommendation is that Mike approve the sampling for tomorrow with the above caveat. Sean – thoughts?  
Lynn

+++++

Lynn Woodbury | CDM Smith | 555 17th Street, Suite 500 | Denver, CO 80202 | direct: 303.383.2382 | fax: 303.308.3003 |  
[woodburyl@cdmsmith.com](mailto:woodburyl@cdmsmith.com)

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**From:** Emilsson, Gunnar  
**Sent:** Tuesday, June 5, 2018 1:27 PM  
**To:** Woodbury, Lynn <[woodburyl@cdmsmith.com](mailto:woodburyl@cdmsmith.com)>  
**Cc:** Coan, Sean <[CoanSM@cdmsmith.com](mailto:CoanSM@cdmsmith.com)>  
**Subject:** FW: CFAC Background SAP - Responses to EPA Comments  
**Importance:** High

Lynn:

Please review, and let me know if Roux's responses are adequate so I can tell Mike. They are hoping to begin sampling tomorrow if Mike approves.

Thanks,  
Gunnar

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**From:** Laura Jensen <[ljensen@rouxinc.com](mailto:ljensen@rouxinc.com)>  
**Sent:** Tuesday, June 05, 2018 12:53 PM  
**To:** Cirian, Mike <[Cirian.Mike@epa.gov](mailto:Cirian.Mike@epa.gov)>  
**Cc:** Emilsson, Gunnar <[EmilssonGR@cdmsmith.com](mailto:EmilssonGR@cdmsmith.com)>; Sanchez, Brian <[sanchez.brian@epa.gov](mailto:sanchez.brian@epa.gov)>; Berry, David <[Berry.David@epa.gov](mailto:Berry.David@epa.gov)>; Dick Sloan <[rsloan@mt.gov](mailto:rsloan@mt.gov)>; John.Stroiazzo@glencore.ca; Steve Wright - CFAC <[swright@cfaluminum.com](mailto:swright@cfaluminum.com)>; Skipper, Sherry <[Skipper.Sherry@epa.gov](mailto:Skipper.Sherry@epa.gov)>; Andrew Baris <[abaris@rouxinc.com](mailto:abaris@rouxinc.com)>; Michael Ritorto <[mritorto@rouxinc.com](mailto:mritorto@rouxinc.com)>  
**Subject:** CFAC Background SAP - Responses to EPA Comments

Mr. Cirian,

On behalf of CFAC, Roux is providing the attached responses to EPA comments on the Background Investigation SAP for the RI/FS. These responses were discussed during our conference call on June 1, 2018.

In accordance with the project schedule, we planned to start the surface water sampling scope tomorrow during the current high water season. Therefore, we are requesting conditional approval to proceed with the background surface water sampling scope. We understand that additional comments related to background scope are still being prepared.

Please feel free to contact me if you have any questions regarding this submittal.

**Laura Jensen, P.G. – NY | Project Hydrogeologist**

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